

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

In Re: On-Line Oil Inc.

)
) **Case No. 09-13006**
)
) **Chapter 7**
)

**MOTION OF CO&G PRODUCTION GROUP, LLC
FOR RELIEF FROM AUTOMATIC STAY
**AND FOR ORDER
REQUIRING TRUSTEE TO ABANDON PROPERTY
AND NOTICE AND OPPORTUNITY FOR HEARING**

COMES NOW CO&G Production Group, LLC an Oklahoma Limited Liability Company by and through its attorney, Chris M. Hunt, of Chris M. Hunt, PLLC, and moves this Court pursuant to 11 U.S.C. §554 to require the Trustee herein to abandon the property described hereinafter and further pursuant to §362(d) for relief from the automatic stay previously entered herein. In support of this Motion, the Creditor would show to the court as follows, to-wit:

1. Online Oil, Inc. (Online) is an Oklahoma corporation that does business in Tulsa County, Oklahoma. On June 5, 2009, Online filed its petition for bankruptcy under Chapter 7 of the United States Bankruptcy Code.

2. Realty Developers, LLC is an Oklahoma limited liability company that does business in Tulsa County, Oklahoma.

3. CO&G is an Oklahoma limited liability company with its principal place of business in Tulsa County, Oklahoma.

4. Realty Management Associates, LLC is an Oklahoma limited liability company that does business in Tulsa County, Oklahoma.

5. That prior to Online filing for Chapter 7 protection it and the remaining parties cited above were involved in a legal dispute over an interest in oil and gas producing property namely the existing producing wells within the Hill Top Redfork Units #1, 2 & the Cromwell Leases (hereafter "Units"). Online v. CO&G CJ-2008-6829, Tulsa County District Court, Oklahoma.

6. Prior to the events relevant to that lawsuit, Realty Developers possessed an interest in the oil and gas minerals in the Units (hereinafter collectively the "Units"), comprising approximately 3000 acres and located in south Tulsa County.

7. Prior to and during the events relevant to this lawsuit, Kris Agrawal possessed ownership interest in the Online Oil, Inc. ("Online") which was the operator of and which owned an interest in the oil and gas minerals underlying the Units.

8. Prior to and during the events relevant to the lawsuit, Kris Agrawal represented himself to be an expert and authority on all aspects of operation of the Units and production of the wells thereon and to be the owner, principal, president or manager of Realty Developers and Online.

9. On or about March 31, 2007, CO&G entered into a Contract for Sale of lease Rights and Appointment of Operator ("First Contract") with Realty Developers whereby CO&G was granted all of Realty Developers' right, title and interest to all equipment and mineral leasehold estate associated with the Units.

10. CO&G entered into a second Contract for Sale of Lease Rights and Appointment of Operator ("Second contract") with Realty Developers, effective March 31, 2007, to acquire all of Realty Developers' right, title and interest to all equipment and mineral leasehold estate

associated with the Units. The Second contract, inter alia, amended certain payment and revenue sharing terms of the First contract and superseded the First contract between Realty Developers and CO&G.

11. Subsequent to CO&G assuming operation of the Units, Online, Realty Developers, Kris Agrawal, Vimala Agrawal, Newton Agrawal, Coal Gas USA, Coal Gas Mart and Realty Management Associates (hereinafter sometimes collectively "the Agrawal Defendants") engaged in a scheme of conveying and re-conveying oil and gas leasehold interests in the Units to, from and by the Agrawal Defendants with the intent to defraud CO&G and interfere with the operations of the Units.

12. Accordingly, any of the parties to the lawsuit in Tulsa County may claim an ownership interest in the oil and gas leasehold estate underlying the Units that is adverse to the ownership of CO&G.

13. The scheme of conveyances of interests in the Units by the Agrawal Defendants amounts to a civil conspiracy designed to interfere with CO&G's possession of its ownership interests in the Units and amounts to an attempt to fraudulently divest CO&G of such interests which is legally acquired by virtue of the agreements between Realty Developers and CO&G.

14. Additionally, the Agrawal Defendants made these conveyances in an effort to undermine and interfere with CO&G's operations and production of the Units and to create a confusing trail of assignments with the sole purpose to thwart civil and judicial efforts to tract potentially liable parties and real parties in interest.

15. By virtue of the parties' agreements, CO&G is the owner of all oil and gas leasehold interest in the Units and is entitled to have any competing interests quieted.

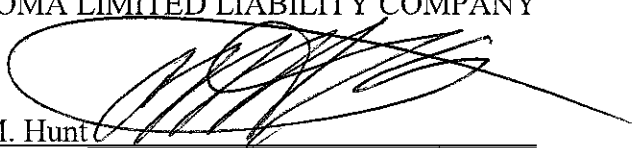
16. Since September 2008, the Agrawal Defendants have conveyed oil and gas leasehold interests in the Units from Online to and among Realty Developers, LLC, Coal Gas Mart, LLC, Coal Gas USA, LLC and Realty Management Associates, LLC.

17. The Agrawal Defendants may claim some adverse right, title or interest to the oil and gas leasehold in the Units that should be quieted pursuant to 12 O.S. §1141.3 et seq.

18. The Unites are producing oil, gas and salt water and present a possible environmental hazard if not properly maintained.

CO&G Production Group, LLC an Oklahoma Limited Liability Company therefore requests this court enter its order terminating the stay with regard to the property described above pursuant to 11 U.S.C. §362 (d) (1) and (2); for the Trustee to abandon said property and to allow CO&G Production Group, LLC an Oklahoma Limited Liability Company to seek a quiet title action against Online in the Units.

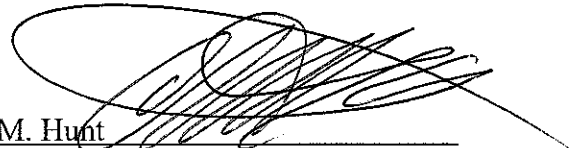
CO&G PRODUCTION GROUP, LLC AN OKLAHOMA LIMITED LIABILITY COMPANY

By:  /s/Chris M. Hunt

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CERTIFICATE OF MAILING

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument was mailed to On-Line Inc., 4133 N. Lincoln Blvd., Oklahoma City, OK 73105 and electronic notice/service of the above and foregoing instrument was given by the Court to David M. Roberts, Affiliated Legal Services, Inc., attorney for the Debtors; On-Line Oil Inc., 4133 N. Lincoln Boulevard, Oklahoma City, OK 73105; and to Lyle R. Nelson, Trustee on this 30th day of November 2009.



/s/ Chris M. Hunt

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ATTENTION: You are hereby notified that you have 15 days from the date of filing of this motion to file a written response or objection to the requested relief. If no response or objection is timely filed the Court may grant the requested relief without further notice. Rule 9006 (f) Fed. Rules of Bankruptcy Procedure allows an additional 3 days to respond if this notice is served by mail.